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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

13 K.A.,

14 Plaintiff,

15 v.

16 MINDGEEK S.A.R.L., et al.,

17
18 Defendants.

Case No. 2:24-cv-4786-WLH-ADS

JUDGE: HON. WESLEY L. HSU

**NOTICE OF LODGING
MATERIALS IN SUPPORT OF
PLAINTIFFS' OMNIBUS
OPPOSITION TO
DEFENDANTS' MOTIONS TO
DISMISS**

Date: JANUARY 31, 2025

Time: 1:30 PM

Courtroom: 9B

Complaint Filed: June 7, 2024

Plaintiff K.A. in the above-referenced matter and Plaintiffs in the additional thirteen (13) related lawsuits before this Court (ECF No. 52, Ex. 1) (collectively, “Plaintiffs”) have lodged with the Court their Materials in Support of Plaintiffs’ Omnibus Opposition to Defendants’ Motions to Dismiss via hand-delivered USB, to be delivered on December 13, 2024.

Exhibit	Bates/ECF No.	Document
13	MindGeek_Fleites_00097925	Excel Sheets for MG Premium Ltd, "List of suppliers with expenses of \$500,000 and more expensed in Website operating expenses and Other operating expenses and all payments made to these suppliers during the same year, and list of all companies under management deals (expenses going to Website operating expenses) and all payments made to these companies
14	MindGeek_Fleites_00097926	Excel Sheets for MG Freesites Ltd, "List of suppliers with expenses of \$500,000 and more expensed in Website operating expenses and Other operating expenses and all payments made to these suppliers during the same year
16	MindGeek_Fleites_00098687	MG Freesites Ltd; List of Suppliers with expenses of \$500,000 and more expenses in Website operating expenses and other operating expenses and all payments made to these suppliers during the year of 2020
17	MindGeek_Fleites_00098688	MG Premium Ltd; List of Suppliers with expenses of \$500,000 and more expenses in Website operating expenses and other operating expenses and all payments made to these suppliers during the same year, and list of all companies under management deals (expenses going to Website operating expenses) and all payments made to these companies;
20	Bergmair_Fleites_00000099	Spreadsheet titled "Guidelines"
20	Bergmair_Fleites_00000100	2 Spreadsheets containing keywords in relation to CSAM, etc.
20	Bergmair_Fleites_00000150	Spreadsheet titled “Black Channels,” “Grey Channels”
20	Bergmair_Fleites_00000154	Spreadsheet titled “Black Channels”
20	Bergmair_Fleites_00000156	Spreadsheet titled “Grey Channels”
20	Bergmair_Fleites_00000158	Spreadsheet titled “Black Channels”

Exhibit	Bates/ECF No.	Document
20	Bergmair_Fleites_00000160	Spreadsheet titled :Grey Channels”
20	Bergmair_Fleites_00000162	Excel Sheets containing keywords
36	Bergmair_Fleites_00001422	Emails exchanged between MindGeek employees with the subject line "May 2020 Budget"
67	MindGeek_Fleites_00001578	2014 MindGeek Group Financial Reporting Package
68	MindGeek_Fleites_00001579	2015 MindGeek Group Financial Reporting Package
69	MindGeek_Fleites_00001580	2016 MindGeek Group Financial Reporting Package
70	MindGeek_Fleites_00001581	2017 MindGeek Group Financial Reporting Package
71	MindGeek_Fleites_00001582	2018 MindGeek Group Financial Reporting Package
72	MindGeek_Fleites_00001583	2019 MindGeek Group Financial Reporting Package
73	MindGeek_Fleites_00001584	2020 MindGeek Group Financial Reporting Package
74	MindGeek_Fleites_00001585	2021 MindGeek Group Financial Reporting Package
79	Bergmair_Fleites_00002318	Excel sheet with a Tab named “PAYOUTS"
94	Bergmair_Fleites_00002458	Excel Sheet with a Tab named "Shareholder dis from 2014"
96	Bergmair_Fleites_00002460	Excel Sheet with Tabs named "Shareholder dis from 2014", "BB 2019 distributions", and "BB 2020 distributions"
100	MindGeek_Fleites_00066311	Excel Sheet titled, "LIPI Expenses Allocation"
101	MindGeek_Fleites_00067772	Excels titled, "LIPI Expenses Allocation" (2014-2020)
102	MindGeek_Fleites_00067773	Excels titled, "LIPI Expenses Allocation" (2014-2020)
103	MindGeek_Fleites_00067774	Excels titled, "LIPI Expenses Allocation" (2014-2020)
104	MindGeek_Fleites_00067775	Excels titled, "LIPI Expenses Allocation" (2014-2020)
105	MindGeek_Fleites_00067776	Excels titled, "LIPI Expenses Allocation" (2014-2020)
106	MindGeek_Fleites_00067777	Excels titled, "LIPI Expenses Allocation" (2014-2020)

1 Dated: December 12, 2024

Respectfully submitted,

3 /s/ Michael J. Bowe

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